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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

RENO MAY, an individual;
ANTHONY MIRANDA, an individual;
ERIC HANS, an individual; GARY
BRENNAN, an individual; OSCAR A.
BARRETTO, JR., an individual;
ISABELLE R. BARRETTO, an
individual; BARRY BAHRAMI, an
individual; PETE STEPHENSON, an
individual; ANDREW HARMS, an
individual; JOSE FLORES, an
individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
THE LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official
capacity as Attorney General of the
State of California, and DOES 1-10,

Defendants.

CASE NO: 8:23-cv-01696 CJC (ADSx)

**STIPULATION TO SET BRIEFING
SCHEDULE AND INCREASE
WORD LIMITS FOR PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Hon. Cormac J. Carney

WHEREAS:

1. Plaintiffs intend to file a motion for preliminary injunction challenging eleven subsections of new California Penal Code section 26230;
2. Given the breadth of Plaintiffs' forthcoming motion, adequately briefing the challenge to each subsection under the applicable law cannot be accomplished within the 7,000 words allowed by Local Rule 11-6.1;
3. The parties have met and conferred and agreed to increased word count limits for both Plaintiffs' opening brief and the Attorney General's opposition;
4. The parties have also reached a mutually agreeable proposed briefing schedule that will still allow this Court to have time to rule on Plaintiffs' motion ahead of the January 1, 2024 effective date of the challenged law;

IT IS HEREBY STIPULATED, by and between Plaintiffs Reno May, Anthony Miranda, Eric Hans, Gary Brennan, Tony Barretto, Isabelle R. Barretto, Barry Bahrami, Pete Stephenson, Jose Flores, Andrew Harms, Dr. Sheldon Hough, DDS, The Second Amendment Foundation, Gun Owners of America, Gun Owners Foundation, Gun Owners of California, Inc., the Liberal Gun Club, Inc., and the California Rifle & Pistol Association, Incorporated (collectively "Plaintiffs"), and Defendant Rob Bonta, through their undersigned counsel, that:

1. Plaintiffs' memorandum of points and authorities shall have a 12,500-word limit;
2. Defendant's opposition brief shall also have a 12,500-word limit;
3. Plaintiffs' reply brief will be the standard 7,000-word limit;
4. Plaintiffs shall file their motion for preliminary injunction and supporting documents by September 29, 2023;
5. Defendant shall file his opposition and supporting documents by November 3, 2023;
6. Plaintiffs shall file their reply by November 20, 2023;
7. The matter will be heard by this Court on December 4, 2023, or as soon thereafter as it has availability.

1 Good cause exists to approve the instant stipulation because, given the
2 breadth of the relief sought in the forthcoming motion and the complexity of issues
3 raised therein, the parties would be prejudiced if they are required to meet a 7,000
4 word limit. The stipulated briefing schedule presented above ensures that the
5 parties will have adequate time and space to thoroughly address the issues
6 presented by this lawsuit.

7 DATED: September 27, 2023 MICHEL & ASSOCIATES, P.C.
8

9 By: /s/ Konstadinos T. Moros

10 Konstadinos T. Moros
11 Attorneys for Plaintiffs
12

13 DATED: September 27, 2023
14

15 By: /s/ Robert Meyerhoff

16 Robert Meyerhoff
17 Attorneys for Defendant
18 Attorney General Robert Bonta
19

20 ATTESTATION

21 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other
22 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
23 content and have authorized the filing.
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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

Case Name: May et al. v. Bonta et al.,
CASE NO: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

STIPULATION TO SET BRIEFING SCHEDULE AND INCREASE WORD LIMITS FOR PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

on the following party by electronic service.

Robert Meyerhoff
Robert.meyerhoff@doj.ca.gov

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 27, 2023.

/s/Laura Palmerin
Laura Palmerin